

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHON JAMES ZINK,

Defendant.

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Case No. 1:22-cr-022

Hon. Hala Y. Jarbou  
United States District Judge

**DEFENDANT'S MOTION FOR DOWNWARD VARIANCE**

NOW COMES the defendant, Nathon James Zink, by his attorney, Joanna C. Kloet of the Office of Federal Public Defender, and hereby moves this Honorable Court to vary downward from the applicable advisory guideline range in this matter. Under the 18 U.S.C. § 3553(a) factors and the standard for the imposition of a sentence sufficient, but not greater than necessary, a downward variance would be appropriate in this case. The basis for this requested variance is further set forth and supported in the Presentence Report and in Defendant's Sentencing Memorandum filed on this day as well.

Respectfully submitted,

SHARON A. TUREK  
Federal Public Defender

Dated: June 14, 2022

/s/ Joanna C. Kloet  
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